

Federal Communications Commission
1919 Main St. NW
Washington, D.C. 20554

In the Matter of: RM-10413

Introduction:

These comments are in reply specifically to the "Reply Comments" made by Hans, Brakob, K0HB to my Comments on RM-10413 received May 6, 2002. I will address each of the three points Mr. Brakob made towards my comments.

Discussion:

A. LITTLE ROOM FOR PROPOSED EXPERIMENTATION "PARK"

Mr. Brakob, chose to only to partially quote me and thus changed the entire meaning of what I said. Specifically from Mr. Brakob's reply comments, "Mr. Fiebig suggest the "experimental park" be limited to "25-50 kHz".

When in fact what I did say was "I feel that a large segment of at least 25-50 kHz should be set aside on an exclusive basis for experimenting." The key words Mr. Brakob left out were **at least**. This means no less than 25-50 kHz. When dealing with a small (current) Novice band this would be at least half to the entire band. The example I provided using 40 meters was only for clarity purposes. Obviously, my proposal as written allows flexibility by the Commission.

B. NOVICE SEGMENTS REMAIN

Mr. Brakob suggests that part of the reason for the decline in the Novice license is due to the ghetto effect where he believes the Novices feel as though they are isolated to a portion of spectrum. He does not say how he draws this conclusion whether it is his opinion or whether he has data to back up this statement. Either way I differ with this statement. In my opinion, the decline in the Novice license and all licenses in general is not due to isolation, but rather due to the one or more reasons. Some reasons, I feel, may be the following:

- The popularity of computers and the Internet has provided a new arena for either experimenting or entertainment depending upon the individual. Chat rooms, Buddy Chat, and email has provided a new mode of communications this is reliable and does not require a license and study.
- The alternate entry path created in the (approximately) last decade has provided a means for people to enter Amateur Radio without learning the Morse Code as long as they are content with staying on VHF/UHF segments of the bands
- In order to learn code, depending upon the individual, practice is required consistently for at least 4-6 weeks and additional time is required in order to progress these skills for higher speeds. Some individuals may feel that it is not worth the investment of time.

With no additional Novice licenses being issued, and the 10-year licenses slowly expiring the current inactive Novice population probably will fade away. In my proposal, a small slow speed or entry level segment would be provided to encourage the development of CW skills for Novices as well as higher class licenses that are unseasoned in the art of code. This is not meant to ghetto the current Novices as Mr.

Brakob suggests, but only to encourage upgrading of their licenses through the incentive licensing program that the commission has used for years.

Additionally, if at a later date this exclusively CW portion was found to be under utilized then future Commission action could reallocate them for some other modes exclusively or on a shared basis.

C DIMINISHES SPECTRUM FOR DIGITAL OPERATIONS

Mr. Brakobs suggests that I talk the talk for promoting digital operations and that in my proposal I diminishing the amount of space available for digital modes by establishing exclusive CW operations.

I proposed allocating exclusive segments to digital, experimental as well as CW operations. In my proposal I suggest that the current Novice CW allocation would be dissolved and refarmed between exclusive digital and experimental allocations. A shared CW/Digital segment would remain. Currently most of the CW activity is in the bottom 75 kHz of the band(s). Technically CW operations would occupy exclusive segments of the band, however, in reality this mode would gain nothing. Again, as mentioned in section B, "Novice Segments Remain", if Morris activity declines and Digital activity increases, then the Commission, at a future date, can reallocate to the Digital mode additional frequencies either on a share or exclusive basis

SUMMARY:

After reading Mr. Brakobs first, second proposals and reply comments. It appears as though we both believe that there should exist an experimental band. Where we, apparently separate, is how much spectrum each mode should occupy as well as the disposition of the Novices.

In Mr. Brakobs eyes, my proposal should be dismissed by the Commission. because he feels, it is regressive. However, I differ with him and believe that my proposal allows the following:

- Novices and beginning CW operators a safe haven free from Digital interference.
- Existing modes of operation an exclusive segments of spectrum with reduced interference from each other.
- Exclusive spectrum for experimentation and advancement of the art.
- Incentive licensing.
- If need be, flexibility for reallocating with minimal disruption.

Rather than being regressive, as Mr. Brakob suggests, my proposal is progressive, but in a less radical manner.

Respectfully,

Timothy J. Fiebig, K2TF